



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

November 30, 1993

Ms. Alice Williams  
Environmental Restoration  
U.S. Department of Energy  
Idaho Operations Office  
785 DOE Place  
Idaho Falls, Idaho 83402

Re: Review Comments for the Draft Track 2 Sampling and Analysis  
Plan for Operable Unit 3-09, Idaho Chemical Processing Plant

Dear Ms. Williams:

The enclosed comments pertaining to the above-referenced document are offered for your consideration.

If you desire additional information, I may be contacted at 206/553-1752.

Sincerely,

A handwritten signature in black ink, which appears to read "Earl Liverman", is positioned above the printed name.

Earl Liverman

Enclosure

cc: Talley Jenkins, DOE-ID  
Tom Stoops, DEQ-IF  
Carol Strong, RUST Geotech



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10, SEATTLE, WASHINGTON

REVIEW COMMENTS  
DRAFT TRACK 2 SAMPLING AND ANALYSIS PLAN  
OPERABLE UNIT 3-09, IDAHO CHEMICAL PROCESSING PLANT

1. Section 1, page 1-1

Given the complexity of OU3-09 due to the number of sites contained therein, it would be useful to include a summary table that clearly describes site groupings and proposed dispositions.

2. Section 1, page 1-1, paragraph 4

The status of all sites should be discussed briefly as part of the Introduction. The discussion should briefly summarize rationale for the proposed investigation. The basis for no action, deferral, and further investigation recommendations should be identified and the decision-making process leading to those recommendations highlighted.

The deferral determination for CPP-69 is inappropriate (Refer to Draft Scope of Work for Operable Unit 3-09, Revision 1). There is insufficient justification for removal and existing institutional controls associated with the site are protective. Therefore, site CPP-69 should be reevaluated as part of the WAG-wide RI/FS. This approach would allow the tank to be D&D by the existing UST program, which as proposed, is compatible with the WAG-wide schedule.

3. Section 2.1.3, page 2-1

Provide the rationale for the selection of the contaminants of concern.

4. Section 2.1.4, page 2-3, paragraph 2

Define the term "cold" cover material. In addition, describe what, if any, effect 11 inches of cold material would have regarding its shielding potential.

5. Section 2.3.2, page 2-32

Discrete sampling depths should be revised to continuous sampling to ensure that a representative sample of soil is collected.

In addition, sampling depths should be revised to address the inhalation and soil ingestion pathway (0 to 6 inches) and external radiation pathway (6 to 48 inches).

6. Section 2.3.2.2, page 2-33, paragraph 2

Given the 1,000-foot length of the trench (CPP-06), one soil boring located approximately midway along the length of the trench does not appear to be adequate to determine the radionuclide species and concentrations. Therefore, absent further justification based on process and/or disposal knowledge, additional soil borings are recommended.